

ORIGINAL

EASTERN DISTRICT OF NEW YORK

-----X
Terole Pierre

Plaintiff,

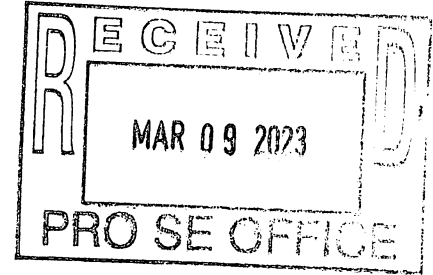
-against-

*New York City, Police officer
Lietent Kaiser & Alexander Yurbhenko*

Defendants.
-----X

AMENDED
COMPLAINT

22 CV 01171 (RPH) (LB)



Filing Respondent: Jerole Pierre

Address: 1348 E103 st

Brooklyn – King

New York - 11236

Telephone: 347-451-6937

Email:jerolepierre79@gmail.com

IN THE UNITED STATE DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PETITION NO. 1:22-cv-01171-^{RPA}~~NRM~~_{SP}-LB

BETWEEN:

JEROLE PIERRE

Plaintiff

NEW YORK CITY, POLICE OFFICER LIETENT KAISER & ALEXANDER YURBHERKO

Defendant

**AFFIDAVIT IN REPLY TO AFFIDAVIT IN ANSWER TO APPLICATION FOR
VIOLATION OF MY FIRST AMENDMENT RIGHTS & CONSTITUTIONAL RIGHT**

I, JEROLE PIERRE, of 1348 E103 St Brooklyn, New York – 11236, being duly sworn, make oath and say as follows:

1. That I have seen Order 22 CV 1171 (RPK) (LB) as a result of a conference held February 1, 2023 in this civil right case. Save where expressly admitted, I read each and every statement made and contained therein, as if the same were set out verbatim, and traversed seriatim.
2. That the order and direction hearing has been recognized in which the court adjourned the matter for a final application to be made with the relevant parties by the March 9th 2023.

3. THE GROUNDS OF THE APPLICATION ARE:

The Applicant has recently been guided by the court, and has obtained additional information as it relates to the Defendants.

4. THE FOLLOWING DOCUMENTARY EVIDENCE was provided to the court

- A report from the Police Complain authority.
- Report from Police Department Legal Bureau
- Letter to the Attorney General.

Signature: *Jerole Pierre*

Date: *03-09-2023*

Introduction

With a deep feeling of injustice and abuse of police authority and other citizens within my neighbourhood and the larger community that the plaintiff wishes to convey some of the incidents that took place within the past few years. The officers of Shomrim Society Complain Unity NYPD, PSA4 130 Avenue who is attached to the 69th and 70th precinct vehemently violated my fundamental rights of liberty and freedom of moving around my residence during the appropriate timing while they unlawfully conducted surveillance of my property without due authorization.

Thereafter, upon questioning the police officers, filing a reports and asking for investigation to be conducted regarding the **infringement of my constitutional right under the Law of the United State** I was threatened and treated unfairly without due process by the police officer.

Applicable Law

In pertinent parts it states as follows: *“Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer’s judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.”*

As it relates to the above "Section 1983 Litigation" refers to lawsuits brought under Section 1983 (Civil action for deprivation of rights) of Title 42 of the United States Code (**42 U.S.C. § 1983**). Section 1983 provides an individual the right to sue *state* government employees and others acting "under color of state law" for civil rights violations. Section 1983 does not provide civil rights; it is a means to enforce civil rights that already exist.

Bivens action: Section 1983 only applies to local *state* governments. A “Bivens action” is the *federal* analog which comes from *Bivens v. Six Unknown Named Agents of Federal*

Bureau of Narcotics, 403 U.S. 388 (1971). Subject to certain exceptions, victims of a violation of the Federal Constitution by a *federal* officer have a right under *Bivens* to recover damages against the officer in federal court despite the absence of any statutory basis for such a right.

Due process of law is a constitutional guarantee that prevents governments from impacting citizens in an abusive way. The due process includes both procedural standards that courts and “law Enforcement” must uphold in order to protect peoples’ personal liberty and a range of liberty interests that statutes and regulations must not infringe. Moreover, it prohibited Government agencies from denying any person “life, liberty or property, without due process of law” or denying “any person within its jurisdiction the equal protection of the laws.”

Moreover, these officers consistently conduct surveillance without probable cause and do not act in any interest as it relates to my concerns and safety.

I am living under the undue influence of the police officer and finding it hard to lead a day-to-day life. Almost every other week it either the police officers or someone who they have influence comes with a new petty dispute to argue and threaten me.

Notably, I was able to have evidence of the CCTV footage of a plain clothes officer on my property to attest to the veracity of the evidence obtained via photographic identifications and recollection of the occurrences as presented in sub judice. However, the identity of the officer was not revealed as related by Lietent Kaiser. (Assistance can be garner from **Munz v. Parr, 758 F.2d 1254, 1257 and_ McClennon et al v. New York City et al**)

The plaintiff feels very unsafe and fearful now even to step out of my house with the fear of encountering the same police officers. I feel utterly exploited under the wrongful blind power due to the police officers. As my last ray of hope, I'm writing this application to you with the hope of my escape from this worst living experience of my life.

Accordingly, I kindly request for you to go through the following accounts and take the appropriate action against all parties' in accordance with due process and equal protection of the law.

Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the name of another person involved in the events giving rise to your claim. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did events giving rise to your claim(s) occur?

13483 st Brooklyn N.Y

B. What date approximate time did the events giving rise to your claim(s) occur?

On 12-13-2021 at 2:04 pm.

C. What are the facts underlying your claim(s) for example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?

The facts are as followed:

1. The plaintiff alleged that some plain clothes police officers attached with badge from the Shomrim Society Complain Unity NYPD, PSA4 130 Avenue who is attached to the 69th and 70th precinct came in front of 1348 E 103st where the plaintiff lives and stood on the other side of the road and waited for the plaintiff to come out and then began walking toward the plaintiff. The plaintiff further alleged that the same department officer mentioned above like Officer Alexandr Yurbherko and a few neighbours all coluided and surveillance the plaintiff by following the plaintiff with cars, this is usually done when the plaintiff leave his home at 1348 E 103st. That on March 12th 2020 an plainclothes officer was seen walking away from the plaintiff car, this was revealed while the plaintiff was approaching his car, it was then noticed that the car was broken into and photos were deleted from the plaintiff phone this was approximately 12pm. (**The case of Katz v. United States, 389 U.S. 347 (1967) give some guidance in this area)**

2. On 12-13-2021 the plaintiff was driving along the road way when he noticed a car following him. Efforts were made to contact 911 in which officer Mr Alexandr Yurbherko responded. However, upon his arrival and detailed information was given to the said officer he refused to question the suspect. This conduct has been received over the past five year when complaints are made.

3. The plaintiff's sons Anthony King and Patrick King who is also a police officer also play a part in what is happening since both individuals have keys to the home.

4. The police officers of the 69th and 70th precinct and the neighborhood police group along with the Shomrim society choplains unit NYPD, PSA4 has for a long while been slandering the plaintiff name by telling the person that the plaintiff is a criminal for five years now. This has resulted in the plaintiff not being able to go anywhere in Brooklyn without being disrespected and has had a significant influence in the plaintiff gaining employment.

5. The said police officer normally gives protection to my neighbour. One such person is my caucasian neighbour at 1349 E 103 st known to me as Fred Michael who is connected to the Jewish community. Thus, when the plaintiff arrived at 112w Manhattan to review some papers, he embarked on a parking lot to park my car and the same caucasian guy and his friends made threats and started to curse at the plaintiff saying "that I should show him that I have money".

Added to this the said caucasian that live at 1349 E st has Jewish connection also with the officers of 70th precinct and 67th precinct and the Shomrim society unit and neighbor policing

group with plain clothes, officer such as Jacqueline Broune and Elliot of 1350, E103 st. *And HAMILTON Michael,*

6. That often as the plaintiff embarked to leave his home to venture out door, the plaintiff usually sees a person taking photos, or conducting surveillance of my person and property.

7. Only recently the plaintiff approached a lawyer officer to get some legal papers notarized. However, upon arrival the clerk who works at the notary officer who name was given as Ms Alicia said and quote "I don't do notary for criminals" This came about because of constant slander by the officer of the 69th precinct and 70th precinct and the plain clothes officers of neighbourhood policing group that represent them. (See appendix 1 document that Ms Alica signed)

8. Further, the plaintiff made an appointment way in advance at Dr Stella Ilyaeve Officer – Medical Center and Physical therapy as the date arrived the plaintiff visited the office only for the receptionist to bar him from entering, he was also disrespected verbally. The incident was reported to the Office of Professional Medical Conduct (OPMC) Department of Health. Where am of the view that no proper investigation was done, since said office forwarded the following correspondence. (Appendix 2 Response from Department of Health)

9. On the 12th March 2020 my car was broken into by one of the police officers of the Shomrim society choplains unit NYPD, PSA4 130 Avenue when the plaintiff spoke about the same nothing was done. *I would provide Exhibits - A-B-C-D-E-F*

10. That no proper investigation was done as it relates to these issues. Even upon the judge giving an order on the 10th October 2022 for us to talk on the ~~10th October~~ *in the Nov* 2022, that is, Mr Joseph Zangrilli came on the phone and was disrespectful, he noted that he is not supposed to be doing any investigation to verified name or identity of any unidentifiable officer.

12. Several officers have continued to give threats and have their crony's follow him, a recent example is such a case occurred on the 2nd January 2023 after the court conference.

13. On occasions when threats are issued to plaintiffs he is often told that no Judge can stop them and they will not rest until they destroy his life.

14. That as the plaintiff leaves home the same group of individuals would normally make gestures and laugh at the plaintiff. Added to this the plain clothes officers are constantly at my home. With the intention to provoke me and has continued to inform people in my area that I violated some woman that I know nothing of; they noted if they can't find the woman they will plant evidence to incriminate me.

15. That on around 10:30 am on the 22nd March 2022 a Lieutenant Simms called on my phone and said that he will proceed to discard all my 911 calls from 2018 to present.

16. That there are 911 report made as it relate to the following cars following me. KUX 2621 AND ESY 7007. *And HBT-9067 and FLL-2717*

Basic for Jurisdiction

Under 42 U.S.C (1983) you may use state or local official for the deprivation of any rights, privileges, or immunities secured by the constitution and (federal law). 'Under "***Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics***, 403 U.S. 388 (1971). You may sue Federal officials for the violation of certain Constitution rights.

A. Are you bringing suit against (check all that apply):

State or local (a 1983 claim)

Federal officials (a Bivens claim)

B. Section 1983 allows claims alleging the deprivation of any right, privileges, or immunities secured by the Constitution and (federal laws). 42 U.S.C 1983. If you are suing under section 1983, what federal constitutional or statutory right(s).

Do you claim is/ are being violated by state or local officials?

The police officers from the NYPD have violated my fourth amendment rights, my first amendment rights and my right to assemble. They have unlawfully taken away my fourteen amendment rights also.

C. Plaintiff suing under Bivens may only recover for the violation of certain constitutional rights. If you suing under Bivens, what constitutional rights

Do you claim is/ are being violated by federal officials?

D. Section ordinance 1983 allow defendant to be found liable only when they have acted under color of any statute, , regulation, custom, or usage, of any State or Territory or the District of Columbia, 42 U.S.C (1983). If you are suing under section 1983, explain how each defendant acted color of state or local law. If you are suing under Bivens, explain how each defendant acted under color or federal law. Attach additional papers if needed.

Racial discrimination was made, along with slander- making false statements which did not allow me to work freely. Financial compensation is being requested by the police officers of the 69th precinct, who placed a tracking device on my car and made unlawful surveillance of my car and person.

Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I did not receive any medical treatment but I suffer tremendously mentally and emotionally due to these issues. What made it more painful was the fact that I already suffer from hypertension.

Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amount of any actual damages and /or punitive damages claimed for the acts alleged. Explain the basis for these claims.

1. I am asking the court for relief from consistent surveillance from the car JGG-3803 and the constant surveillance by Officer Alexandr Yubherko which had hindered me from working freely.
2. I am also seeking monetary damages of \$48,000,000 for all my suffering over the last five years by the plain clothes agents that I know are federal agents that was mentioned earlier and the photos was taken on my property along with members of 67th 69th and 70th precinct officer as well as the neighborhood Policing group and Shomrim Society Complain Unity NYPD.
3. Asking the court for the officers and all parties involved to stop slander my name and discriminating against me and interrupting my employment.
4. Protection or peace order to be made.

Certificate and Closing

Under Federal Rule of Civil Procedure 11, by signing below. I certified to the best of my knowledge, information and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law ;(3) the factual contentions have evidentiary support or , if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirement of Rule 11.

A. For Parties without an Attorney

I agree to provide the Clerk's Office with any changes to address where case – related papers may be served.

I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 03-09-2023

Signature of Plaintiff: Jerole Piere

Printed Name of Plaintiff: Jerole Piere

3/9/23
Louis H. Trotman
Notary Public State of New York
NO. 01TR4024650
Certified in Kings County
Commission Expires Jan. 17, 2026

[Handwritten Signature]

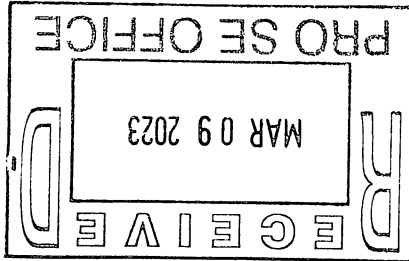


Department of Health

KATHY HOCHUL
Governor

JAMES V. McDONALD, M.D., M.P.H.
Acting Commissioner

MEGAN E. BALDWIN
Acting Executive Deputy Commissioner



February 7, 2023

Jerole Pierre
1348 East 103 Street
Brooklyn NY 11236

OPMC # 23-02-0693

Dear Jerole Pierre:

In accordance with New York State Public Health Law Section 230, the Office of Professional Medical Conduct (OPMC) has reviewed your correspondence regarding Stella Ilyae, MD. This office is responsible for investigating allegations of professional misconduct by physicians, physician assistants and special assistants. We assessed each of the allegations you raised and the physician's actions in the context of New York State Education Law Section 6530 that defines the parameters of medical misconduct.

We have concluded our review of the information that you provided and have determined that the issues described will not warrant action within the scope of our statutes. Accordingly, the information you have supplied will be retained in our confidential files and no further action will be taken at this time.

You may wish to forward your concerns regarding allegations of discrimination to the Office for Civil Rights (OCR) at the address provided below:

Centralized Case Management Operations
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Room 509F HHH Bldg.
Washington, D.C. 20201
OCRMail@hhs.gov
1-800-368-1019

If you have further questions regarding the processing of your complaint, or this letter, you may contact this office at 1-800-663-6114.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Golden", with a horizontal line extending from the end of the signature.

J. Golden, RN
Nurse Investigator
Central Intake Unit
Office of Professional Medical Conduct

Exhibits-B



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
CIVIL RIGHTS BUREAU

September 29, 2021

Jerole Pierre
1348 103rd Street
Brooklyn, NY 11236

Our File Number: 21-044815

Dear Jerole Pierre:

Thank you for contacting the Civil Rights Bureau at the New York Attorney General's Office. Based on the information you provided, we are unable to investigate this matter because it does not appear to allege a pattern or practice of discrimination. Should you wish to contact a private attorney, you may obtain attorney referrals from your local bar association.

Please note that your complaint with the Attorney General's office does not have any impact on applicable statutes of limitations. By filing a complaint with the OAG, you have not initiated a lawsuit or a proceeding, nor has the OAG initiated a lawsuit or proceeding on your behalf.

Sincerely,

Civil Rights Bureau

Exhibits-B

22cv-01171-RPK-LB

FILL IN EITHER PARAGRAPH 3 or 4

3. I have notified my opposition to appear in Part 72, 2nd Floor - Room 295 at 360 Adams Street, Brooklyn, NY,

a) [WHEN DID YOU CALL OR FAX THEM?]

On the 01 of July, 2021 at 11:44 AM / PM
DAY MONTH TIME

b) [WHAT NUMBER DID YOU DIAL?]

212 - 504 - 4115
AREA CODE

c) [DID YOU RECEIVE A RESPONSE?] CIRCLE ONE: YES / ☒ NO

[IF YES, WRITE RESPONSE HERE AND INCLUDE THE NAME OF THE PERSON WITH WHOM YOU SPOKE]

d) [WHEN DID YOU TELL THEM TO APPEAR IN COURT - Must be a specific time between 9 a.m. - 12 p.m. or 2-3 p.m. (e.g. 10:40 a.m.)]

On the _____ of _____, 20____ at _____ AM / PM
DAY MONTH TIME

4. I believe that there will be significant prejudice by giving notice because: [DETAIL REASONS]

Because the defendants would get
a chance to prepare

5. Has a previous application been made for this relief?

CIRCLE ONE: ☒ NO / YES _____

[If yes, you must provide a description of where, when and by whom the request was made, the result, and if the application was unsuccessful, why you believe you are entitled to apply again.]

DATE: July 1, 2021

[Signature]
[NOTARY PUBLIC]

[Signature]
[SIGN IN THE PRESENCE OF A NOTARY PUBLIC, except attorneys]

Jerole Picore
[PRINT YOUR NAME]

Lisa Olmo
Commissioner of Deeds, City of New York
Qualified in New York County
No. 1-10154
Comm. Exp. 10/1/21

Exhibits-B

22CV-01171-RPK-LB

VERIFICATION

STATE OF NEW YORK)

SS:

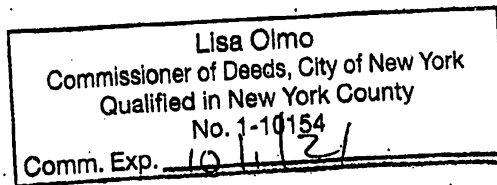
COUNTY OF KINGS)

Terole Pierre [YOUR NAME], being duly sworn, deposes and says: That I am the petitioner in this proceeding, that I have read the foregoing petition and know the contents thereof; that the same is true to my own knowledge, except as to matters therein stated to be alleged on information and belief; and that as to those matters I believe them to be true. To the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are not frivolous as defined in subsection (c) of section 130-1.1 of the Rules of the Chief Administrator (22NYCRR).

Sworn to before me this 1st day
of July, 2021

[Signature]
Notary Public

Terole Pierre
Petitioner
[SIGN YOUR NAME BEFORE A
NOTARY PUBLIC]
Terole Pierre
[PRINT NAME]



03/01

Exhibits - C

22-cv-01171-RPK-LB



ERIC ADAMS
MAYOR

CIVILIAN COMPLAINT REVIEW BOARD
100 CHURCH STREET 10th FLOOR
NEW YORK, NEW YORK 10007 ♦ TELEPHONE (212) 912-7235
www.nyc.gov/ccrb



ARVA RICE
CHAIR

February 09, 2022

Jerole Pierre
1348 East 103rd Street
Brooklyn, NY 11236

CCRB Case Number: 202102088

CCRB Squad Manager: Laura Kastner - lkastner@ccrb.nyc.gov

Dear Jerole Pierre:

The Civilian Complaint Review Board has concluded its thorough investigation of the incident you were involved in. The staff of the CCRB recognizes the meaningful contribution you made by telling your story so this investigation could move forward. After reviewing all of the evidence gathered throughout the investigation, which includes your testimony, the Board of the CCRB has come to the findings (see below) of the allegations regarding this incident. There is an enclosed form that lists what each of the potential outcomes of an investigation is, and explains what each outcome means.

Allegation(s) by letter:

Board Finding(s):

- A) Abuse of Authority:
An officer searched the vehicle in which
Jerole Pierre was an occupant.
- B) Abuse of Authority:
An officer searched Jerole Pierre's recording
device.
- C) Abuse of Authority:
An officer deleted information on Jerole
Pierre's electronic device.

Officer(s) Unidentified

Officer(s) Unidentified

Officer(s) Unidentified

Where new evidence or a previously unavailable or uncooperative witness becomes available within eighteen months of the incident, the Board may reopen the case if such new evidence may reasonably lead to a different finding. To request that the Board reopen a closed case, please detail the new evidence and the request in a letter addressed to Director of Case Management, at CCRB, 100 Church Street, 10th Floor, New York, NY 10007.

The integrity and quality of the Police Department's service to the public depends, in large part, upon receiving information from citizens like you regarding the performance of police officers as they carry out their duties. The Civilian Complaint Review Board is grateful for the effort you put forth and your willingness to participate in this extremely important process.

CCRB CTS - Confidential

If you have any further questions about this matter, please call Team Manager Laura Kastner, who supervised the investigation of this case, at (212) 912-2068.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Darche', with a stylized flourish at the end.

Jonathan Darche
Executive Director

Enclosure

EXHIBITS - D

22-cv-01171-NRM-LB

Gm Miss Attorney General i write you in relation to some police office that i am trying to identify for my case i got in the Eastern District of New York court my case number is 22 cv 01171 and i submitt on the 10-14-2022 an Amended complaint and on the 10-17-2022 i submitt an Attactment to my Amended complaint with exhibits. I Think the system is not

doing their best to identify these officers i am asking you to help me to identify these officers because they destroy
 1 year of my life my wife vote for go
 I will send the address of two officers and
 There plate number for you to identify

The address for one office is 1363 E 103 St
 Brooklyn . N.Y. 11236 the plate is GLW-3276
 This is the only officer car in the area that done not have
 a visble number plate so i am not sure about the plate

3/9/23
 Louis H. Trotman
 Notary Public State of New York
 NO. 01TR4024650
 Certified in Kings County
 Commission Expires Jan. 17, 2024

and the other is 1329 E 103rd Brooklyn, N.Y. 11236 The plate number is KMA-3310 I will also ^{or CUF-6610} post a picture of a John Doe for you to identify him i know people will try to stop you from helping me because these officers have people all over i ^{want} one to believe that they have influence in the New York office of the FBI. This is what holding up my case from moving forward so this is very important to me and my wife. I would also send you date and time that you can check the video footage of Home depot at ALToona, PA 16602 (814) 944-1309

These are the date - 11-28-2021 at 8:25 Am

Thank you 10-06-2021
 Jerole Pierre at 3:45 pm
 347-641-6837
 Gerde Pine 12-22-2022

9-4-2021 at 3:06 pm
 11-13-2021 at 8:27 pm
 11-07-2021 at 9:17

US District Court

Eastern District New York (Brooklyn)

Civil Docket For CASE #: 22-cv-0171-RPK-LB

These are some of the addresses that
is involve constant surveillance allege

the number has follow

1329 E 103 st

1356 E 103 st

1305 E 103 st

1349 E 102 st

1330 E 103 st

1332 E 103 st

1345 E 102 st

1306 E 103 st

1341 E 103 st

1347 E 103 st

1344 E 103 st

1350 E 103 st

1342 E 103 st

1354 E 103 st

1355 E 103 st

1338 E 103 st

1336 E 103 st

1331 E 103 st

1349 E 102 st

1346 E 102 st

1343 E 103 st

3/9/23
Louis H. Trotman
Notary Public State of New York
NO. 01TR4024650
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Commission Expires Jan. 17, 2024

Exhibits I

POLICE DEPARTMENT
LEGAL BUREAU
F.O.I.L Unit, Room 110C
One Police Plaza
New York, NY 10038

Jerole Pierre
1348 E 103 St.
Brooklyn, NY, 11236

22-cv-01171-RPF-LB

January 16, 2023

FOIL Request #: FOIL-2023-056-01090
Your File #: 2021-069-001357

Dear Sir or Madam:

This is in response to your request received by this office on January 12, 2023 in which you requested access to certain records under the New York State Freedom of Information Law (FOIL).

Your request has been assigned to PAA STONE (646-610-6279) of this office. Before a determination can be rendered, further review is necessary to assess the potential applicability of exemptions set forth in FOIL, and whether the records can be located. I estimate that this review will be completed, and a determination issued within 90 business days of this letter.

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and the name and address of the Records Access Appeals Officer.

Very truly yours,

Richard Mantellino
Lieutenant
New York City Police Department (NYPD)

US District Court

Eastern District of New York (Brooklyn)

This picture is to show that the
NYPD allege use T car to surveil, etc.



3/9/23

Louis H. Trotman
Notary Public State of New York
NO. 01TR4024650

Certified in Kings County
Commission Expires Jan. 17, 2024

Louis H. Trotman